A PROPOSAL FOR CHANGE IN THE FCC PERSONAL RADIO SERVICE

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To enhance efficiency and simplify regulations, an effective approach is to reduce and streamline the existing rules. I propose the consolidation of three subparts within the Personal Radio Service (PRS) under Part 95: GMRS (95E), FRS (95B), and MURS (95J). These subparts exhibit minimal technical differences, yet each currently operates under a slightly distinct set of administrative regulations. This presents an opportunity to unify them into a single regulatory framework, thereby providing cohesive services to the public.

Furthermore, minor adjustments to the rules will effectively address channel congestion identified by the FCC. It is also vital to maintain the concept of "family communications," which underpins FRS, MURS, and GMRS. Thoughtful modifications to the regulations can facilitate communication among family members dispersed across the country. Such changes represent easily accessible opportunities for improvement. Additional details regarding these proposed changes are outlined below.

The Federal Communications Commission (FCC) has established the Personal Radio Service (PRS) rules, which designate 35 exclusive voice channels within the VHF and UHF spectrum. This service presents exceptional communication opportunities, enabling each US citizen to connect with family, friends, and neighbors without dependence on cell phones or the Internet. Such services are valuable for both everyday activities and emergency situations. With a focus on accessibility, PRS encourages public participation in voice communications without the requirement of written testing, or even licensing, provided that users agree to adhere to FCC regulations.

Currently, there are approximately 340,000 licenses issued under the General Mobile Radio Service (GMRS), each serving families rather than individuals. Assuming a conservative estimate of three individuals per license, this translates to over 1 million people utilizing the 30 available GMRS channels.

It is important to note that these 35 channels are also shared with a myriad of Family Radio Service (FRS) and Multi-Use Radio Service (MURS) users, leading to potential congestion, particularly in densely populated cities, national parks, and popular tourist destinations.

Several proposed adjustments aim to A) streamline regulations, B) reduce channel congestion, C) simplify the certification process for radio hardware, and D) establish a clear pathway from 'Unlicensed' to 'Licensed Untested' and ultimately to 'Licensed Tested' status (Amateur Radio Service) for two-way radio operations. These enhancements are designed to foster a more interconnected community that benefits everyday life, emergency readiness, and response capabilities.

1) Make no changes to the legacy channels for GMRS, FRS and MURS. Permit currently certified radios for GMRS, FRS and MURS to continue operating on existing channels. This protects user investments in radios and accessories.

2) Join FRS and MURS into a single radio service. This is to make a single new unlicensed service named the "Family Unlicensed Radio Service" (FURS). FURS users can use legacy FRS and MURS channels, plus additional channels added in this proposal.

3) Add additional simplex channels to FURS legacy channels. Recommended, the addition of 5 VHF and 5 UHF simplex channels to FURS. This provides a few additional channels to reduce congestion in higher population areas. This change provides 10 VHF and 27 UHF simplex channels. It is suggested that the FURS radios are limited to 5 watts.

4) FURS radios would be certified by some existing certification type (like Part 90, or a small extension current GMRS radio certification), or the FCC can define a new type that would cover both FURS and the New GMRS.

5) New GMRS would remain a licensed service available without testing. Potentially, it can serve the function of the old ARS Novice License, but not linked to Part 97 (although integration of FURS and New GMRS to Part 97 could be achived). This would establishing a personal growth / learning path from Unlicensed FURS, to Licensed GMRS, to ARS (Ham) licenses. It provides an educational path for new users to learn about 2-way radios. Each user can advance to the level that they decide is necessary to communicate with their family, friends and neighbors.

6) Add additional simplex channels to GMRS legacy channels. Recommend adding at least 5 VHF and 5 UHF simplex channels to GMRS. This provides a few additional licensed simplex channels to reduce congestion in higher population areas. It also provides a set of channels unique to GMRS (currently

all GMRS channels are shared with FRS).

7) Add at least 16 New GMRS repeater pairs to (8 VHF and 8 UHF). Four of the UHF pairs and four VHF pairs would be available only for stand-alone repeater operation. The other four new UHF and VHF pairs would be made available for stand-alone repeater operation or linked repeater networking. This is another incentive to move from 'Unlicensed' to 'FCC Licensed' status.

8) The New GMRS added repeater pairs allow operation without the frequency overlaps and confusion with the old GMRS / FRS channels 14 – 21 and 22 – 30.

9) Change the GMRS rules to allow repeater linking (on four of the new VHF and four new UHF channel pairs) using packet switched networks (including the Internet) to link GMRS repeaters. Restrict GMRS repeater linking using circuit switched networks.

10) Change the GMRS rules to allow maximum power output at 50 watts out of the transmitter or 50 watts out of the duplexer for repeater operation. Also, reset GMRS channels 8 to 14 to the same power limits as channels 1 to 7.

11) Radio configuration. The following entities can program the configuration of New GMRS and the FURS radio channels, including frequency, tone options, power settings, channel names and other parameters the manufacturer designs into the radio.

a) Entities that manufacture New GMRS, FURS, Old FRS, Old MURS, Old GMRS radios and their approved repair centers.

b) Currently licensed Amateur Radio Operators (Part 97).

c) Commercial radio service installers and repair technicians.

*) Entities 'a' to 'c' above already edit radio configuration files today.

d) Currently licensed GMRS users would be limited to loading configuration files into a New GMRS or FURS radio. These configuration files must be generated, approved and provided by one of the three entities listed in 'a' to 'c' above.

12) New GMRS and FURS radios must have a configuration locking mechanism

that provides protection against unintentional unlocking.

13) A person with a GMRS license and an Amateur Radio License may program and use their *personal radios* with GMRS, FURS and Amateur frequencies.

*) Especially in congested areas, the capability layering of these rule changes will encourage users to move toward the licensed service, the New GMRS.

SERVICE	CHANNELS, suggested manufacturer layout for channel names and ordering
Old MURS	MURS 1-5
Old FRS	FRS 1 - 22
Old GMRS	GMRS 1 – 22 GMRS 23 – 30 (repeater pairs)
FURS	FURS 1 – 22 (Old FRS) FURS 23 – 30 (reserved) FURS 31 – 35 (Old MURS) FURS 36 - 40 (new FURS UHF simplex) FURS 41 – 45 (new FURS VHF simplex)
GMRS	GMRS 1 – 22 (Old FRS) GMRS 23 – 30 (Old GMRS repeater pairs) GMRS 31 – 35 (Old MURS) GMRS 36 - 40 (new FURS UHF simplex) GMRS 41 – 45 (new FURS VHF simplex) GMRS 46 - 50 (new GMRS UHF simplex GMRS 51 - 55 (new GMRS VHF simplex) GMRS 61 - 68 (new GMRS UHF repeater) GMRS 71 – 78 (new GMRS VHF repeater) Reserved channel #'ers 56-60 & 69-70 Linking Allowed Channels 61-64 & 71-74